

1 John Samberg (Nevada Bar No. 10828)  
2 Royi Moas (Nevada Bar No. 10686)  
3 **WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP**  
3773 Howard Hughes Parkway, Suite 590 South  
Las Vegas, Nevada 89169  
Tel.: (702) 341-5200 / Fax: (702) 341-5300  
4 rmoas@wrslawyers.com  
jsamberg@wrslawyers.com

5 *Attorneys for Plaintiffs*

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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA, SOUTHERN DIVISION**  
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10 RB VENTURE PARTNERS LLC, a Nevada  
limited liability company, and 19  
11 ENTERPRISES LLC, a Nevada limited  
liability company,

12 Plaintiffs,

13 vs.

14 MONTROSE HOLDINGS, LLC, a Puerto  
15 Rico limited liability company; JOHN COTA  
SMALL, also known as JOHN C. SMALL,  
16 also known as JOHN SMALL, an individual,  
and DOES 1 through 10, inclusive,

17 Defendants.  
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Case No. 2:23-cv-02150-JAD-DJA

**UNOPPOSED MOTION TO EXTEND  
THE DEADLINE FOR THE  
DEFENDANTS TO FILE A RESPONSIVE  
PLEADING TO PLAINTIFFS'  
COMPLAINT**

[Second Request]

19 Pursuant to Local Rules IA 6-1, 6-2 and 7-1, Plaintiffs, RB Venture Partners LLC, and 19  
20 Enterprises LLC("Plaintiffs") and Defendants Montrose Holdings, LLC; John Cota Small, also  
21 known as John C. Small, also known as John Small, ("Defendants"), by and through their  
22 respective undersigned counsel of record, stipulate, agree, respectfully move the court to extend  
23 the deadline for Defendants to file a responsive pleading to Plaintiffs' Complaint from May 3,  
24 2024 to May 17, 2024.

25 Good cause exists to grant this unopposed Motion based on the following facts:

26 1. Pursuant to LR IC2-1, Defendants are currently in the process of requesting the  
27 court's authorization to register as a filer in the Electronic Filing Access system.

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1           2.       Defendants shall enter a formal appearance forthwith within 5 business days, as  
2 agreement to do so is an express condition of this extension.

3           3.       Should Defendants fail to enter a responsive pleading within the extension period,  
4 Plaintiffs will proceed with seeking default entry against Defendants.

5           4.       This is the second Motion for extension of time for Defendants to file a responsive  
6 pleading to Plaintiffs' Complaint from May 3, 2024 to May 17, 2024. The parties had previously  
7 been engaged in settlement discussions.

8           5.       This extension will enable Defendants to obtain local counsel and/or determine  
9 next steps.

10          6.       Plaintiffs, RB Venture Partners LLC and 19 Enterprises LLC ("Plaintiffs") do not  
11 oppose this motion.

12          7.       Defendants do not anticipate making additional requests for an extension and  
13 understand that Plaintiffs will object to any further extension requests.

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1           8.       Pending engagement of local counsel, Defendants John Small and Montrose  
2 Holdings, LLC are being served in care of their authorized legal representative in New York,  
3 Ronald Rossi of Kasowitz Benson Torres, LLP.

4           9.       The parties continue to be engaged in settlement discussions.

5       Dated: May 3, 2024

**WOLF, RIFKIN, SHAPIRO,  
SCHULMAN & RABKIN, LLP**

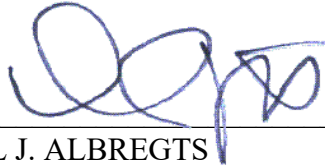
6  
7       By: 

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Roi Moas (Bar No. 10686)  
3773 Howard Hughes Parkway  
Suite 590 South  
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jsamberg@wrslawyers.com  
rmoas@wrslawyers.com

*Attorneys for Plaintiffs*  
RB VENTURE PARTNERS LLC, and  
19 ENTERPRISES LLC

16       **IT IS SO ORDERED:**

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19       \_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

21       DATED: May 6, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2024 a true and correct copy of **UNOPPOSED MOTION TO EXTEND THE DEADLINE FOR THE DEFENDANTS TO FILE A RESPONSIVE PLEADING TO PLAINTIFFS' COMPLAINT [Second Request]** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By Carolyn R Bott  
Carolyn Bott, an Employee of  
WOLF, RIFKIN, SHAPIRO, SCHULMAN &  
RABKIN, LLP